

REMARKS

In the Office Action, claims 1 and 2 stand rejected under 35 USC 102(e) as being anticipated under *Yamamoto*. By implication, *Yamamoto* is said to teach each and every element of each of the objected claims. However, *Yamamoto* is fundamentally a washing machine, not a mop-bucket. The Applicant has amended claim 1 to more clearly articulate the invention as a device for use with mop buckets. *Yamamoto* will never be used to clean a mop (or mop bucket). In fact, introducing a mop to *Yamamoto* would make his device impossible to operate since it would be impossible to close. Further, *Yamamoto* never mentions mops, mop buckets, cleaning floors or anything else that could suggest a mop in his application. Accordingly, since *Yamamoto* does not teach, show or suggest cleaning either a mop or a mop bucket as described in presently amended claim 1, it is respectfully requested that the Examiner withdraw his rejections to claim 1, and to claim 2 which depends from claim 1, based on *Yamamoto* under 35 USC 102(e).

Claims 1, 4, 5, 9, 10, and 11 stand rejected under 35 USC 102(e) as being anticipated under *Nichols*. By implication, *Nichols* is said to teach each and every element of each of the objected claims. *Nichols* teaches using a motor to drive water through a mop in order to rinse the mop, and captures (some of) the dirt in a centrifugal vortex. However, the essence of *Nichols* is the rinsing of a mop, not the movement of water in and out of a mop bucket. *Nichols*' device is heavy, encumbered by an electric cord, and requires a separate unit for each mop being used. In addition, even with the use of *Nichols*, one must still empty dirty water from his device manually. Ultimately, *Nichols* is a fancy mop bucket with motors enclosed and bandied about to manipulate

water to rinse a mop in a “closed loop” manner (meaning that water does not enter and exit the mop bucket, but that the mop bucket cleans the water already in the mop bucket). Further, *Nichols* never even identifies the problem of avoiding the injuries that can occur from lifting heavy objects. The reason why is clear--the device of *Nichols* is itself quite a heavy object!

Claim 1 and 4 have been amended to more clearly articulate the invention by pointing out that it removes and adds water to a separate mop bucket (in fact, one could use the Applicant’s invention to clean the device of *Nichols*.) *Nichols* does not teach, show or suggest moving water into or out of a mop bucket separated from it device. Accordingly, the withdrawal of the rejection to claims 1, and 4, and those that depend therefrom, is respectfully requested.

Claims 2, 3, 6-8, 12, 13 and 15 stand rejected under 35 USC 103(a). It is stated that *Nichols*, in combination with *Biggs*, can be said to teach each and every element of each one of the above claims. *Biggs* teaches a mop bucket with a pedal-actuated wringer. *Nichols* has already been discussed and shown not to apply to the teachings of the present invention. Claim 14 is rejected under 35 USC 103(a). It is stated that *Nichols*, in combination with *Kweon*, can be said to teach each and every element of each one of the above claims. *Kweon* teaches a dirty mop detection device for use with a riding mop (note the “rotary mop” of column 3, lines 58 and 65), and does not even mention a mop bucket.

Mischaracterizations of the cited art need not be addressed herein because combining *Nichols*, with either *Biggs* or *Kweon* should be impermissible for at least the following reasons:

1. Non of *Nichols*, *Biggs*, or *Kweon*, contain a suggestion to combine one with another, and at least such a suggestion is required under well-established case law. Each of *Nichols*, *Biggs*, and *Kweon*, provide a self-contained, total solutions to an identified problem. *Kweon* teaches identifying a dirty mop, nothing more, and does not identify the problems of dirty water in a mop bucket--how could it since it does not even mention mop bucket? *Nichols* and *Biggs* take different, independent, and mutually exclusive approaches to cleaning a mop. No one of ordinary skill in the art would ever find it obvious to combine more than one of the references to solve any problem identified prior to the identification of the problems solved by the present patent application. Each solves what it perceives to be a problem--no more, no less.

2. *Nichols*, *Biggs*, and *Kweon* take different approaches to solving their identified problems, creating mutually exclusive paths to solve their unique problems. For example, *Kweon* uses infra-red sensors to detect a dirty rotary mop, while *Nichols* (with automation) and *Biggs* (with foot-power) each apply their teachings to cleaning a mop using water already existing in a mop bucket. One would never even seek to combine *Nichols* and *Biggs*--the result would be a bulky mess of a mop-cleaning device with manual squeegees and automated flushes, and the water would still be left in the mop bucket. How exactly, would one propose to combine *Nichols* with *Biggs* to create a functioning device? Such different teachings would cause one of ordinary skill in the art to set aside *Kweon* and *Biggs* apart from *Nichols*, rather than motivating one to combine

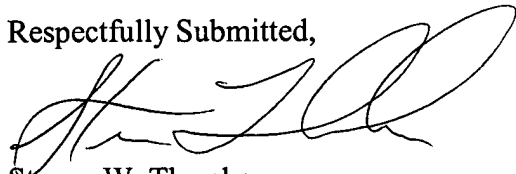
the references. In fact, cleaning a mop with a foot-actuated strainer teaches away from cleaning a mop using a water flush.

3. Because cleaning a mop in a bucket with a flush is different from detecting dirt on a rotary mop, it is in fact physically impossible to combine *Kweon* with *Nichols*. Nevertheless, should the Examiner maintain that such a combination is permissible, such a combination would either be non-functioning, or either unnecessarily result in a hazardous organization of function--how, exactly, would one propose to combine the rotary and hand-held mops?

Further, even if *Nichols*, were combined with either *Biggs* or *Kweon*, one would still be required to make additional, awkward, modifications to achieve the result of emptying a mop bucket and flushing a mop bucket with water. Accordingly, it should be now be obvious that *Nichols*, *Biggs* and *Kweon*, lack the claimed features of the present invention's presently amended independent claims.

Thus, it is believed that the pending Claims are allowable as amended, and allowance of said claims is respectfully requested. If the Examiner has any other matters which remain, the Examiner is encouraged to contact the under signed attorney to resolve these matters by Examiner's Amendment where possible.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Steven W. Thrasher', written in a cursive style.

Steven W. Thrasher
Reg. No. 43,192
Attorney for Applicant